



Your business
is our business.

REDACTED - FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsitel@jsitel.com

June 29, 2015

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

JUN 29 2015
Federal Communications Commission
Office of the Secretary

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Oregon Farmers Mutual Telephone Company
Study Area Code 421935**

Dear Ms. Dortch:

On behalf of Oregon Farmers Mutual Telephone Company ("Oregon Farmers"), JSI files the attached confidential and redacted versions of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Sledge seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is also being filed this date via the FCC's Electronic Comment Filing System. In addition, attached is a letter requesting confidential treatment under Sections 0.457 and 0.459 of its Progress Report on its Five-Year Service Quality Improvement Plan as required by Section 54.313(a)(1).³

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

cc: Charles Tyler, Telecommunications Access Policy Division (two copies, confidential)

No. of Copies rec'd 043
List ABCDE

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket No. 10-90 *et al.*, Protective Order, DA 15-712 rel. June 17, 2015 (Protective Order). 47 C.F.R. § 54.313(f)(2).

³ 47 C.F.R. §§ 0.457, 0.459, 54.313(a)(1).

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124



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June 29, 2015

Accepted

JUN 29 2015

Federal Communications Commission
Office of the Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2015 ETC Annual Report of Oregon Farmers Mutual Telephone Company
Study Area Code 421935
Request for Confidentiality**

Dear Ms. Dortch:

John Staurulakis, Inc. ("JSI"), on behalf of its client Oregon Farmers Mutual Telephone Company ("Company") hereby requests, pursuant to Sections 0.457 and 0.459 of the Commission's rules,¹ withholding from public inspection certain information contained in an attachment to the above referenced reporting requirement. The Company provides the following in support of its request, numbered consistent with the subparagraphs of Section 0.459(b).²

1. The information for which the Company is seeking confidential treatment is an attachment to the Company's annual reporting information pursuant to Sections 54.313 and 54.422 of the Commission's rules ("Report").³
2. Pursuant to Section 54.313(a)(1), Rate-of-Return Eligible Telecommunications Carriers ("ETCs") must file with the Commission a Progress Report on its Five-Year Service Quality Improvement Plan ("Progress Report") which is contained in the attachment to the 2015 Report.⁴
3. The information contained in attachment for which the Company seeks the withholding from public inspection is the entirety of data pertaining to the Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment. Information of this nature is confidential commercial information routinely withheld from public inspection.

¹ 47 C.F.R. §§ 0.457, 0.459.

² 47 C.F.R. § 0.459(b)(1) through (9).

³ 47 C.F.R. §§ 54.313, 54.422.

⁴ 47 C.F.R. §§ 54.313(a)(1).

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phone: 801-294-4576, fax: 801-294-5124

4. With respect to identifying the degree to which the subject attachment concerns a service that is subject to competition, the information is of a financial and competitive nature regarding the provision of telecommunications services. The Line 112 attachment contains competitively sensitive information related to proposed improvements or upgrades and maintenance the Company's network.

In its *March 5, 2013 Order*, the FCC. The FCC specified that for rate-of-return carriers, the five-year plans "should describe the carrier's network improvement plan, which should provide greater visibility into current plans to extend broadband service to unserved locations in rate-of-return service territories."⁵ The Company's Progress Report updates this information as well as provides maps and detailed information as to whether or not network improvement objectives were achieved at the wire center level. Accordingly, because the Company is a rate-of-return carrier, it must file Progress Reports which contain proprietary, competitively sensitive information related to the Company's existing network including the specific locations of customers as well as describe proposed improvements or upgrades and maintenance of its network throughout its service area. Specifically, this information sets forth services provided by the Company over its existing network including specific locations of customers as well as planned network improvement and maintenance for the years 2015 through 2019 including project start and completion dates, population that will be impacted by the improvements and upgrades at the wire center level and projected capital costs associated with the improvements and upgrades and operating costs associated with maintaining the network including depreciation for investments that have already been made. As such, this information contains competitively sensitive information related to the Company's existing network as well as detailed plans at the wire center level for network upgrades and maintenance projected for the years 2015 through 2019.

5. With respect to identifying possible exposure to competitive harm, the information contained in the Line 112 attachment is information that is not customarily released to the public. This information is proprietary to the Company, is unique to the Company's serving territory and is only known to the Company and its authorized agents. If the Information is not protected, it would have economic value to potential competitors who would be able to target their marketing to specific customers. In a competitive telecommunications marketplace, this type of information is highly sensitive. If publicly disclosed, it would enable competitors to craft business plans that capitalize on their knowledge of the locations of the Company's customers which would place the Company at a competitive disadvantage.

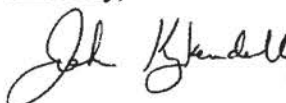
⁵ See *Connect America Fund et al.*, WC Docket 10-90 *et al.*, Order, DA 13-332 (rel. Mar. 5, 2013) ("*March 5, 2013 Order*") at para 9 citing Section 54.202(a) (1) (ii).

6. With respect to steps the Company has taken to ensure against unauthorized disclosure of the information contained in the attachment, the Company is filing the attachment under seal. The Company uses the information contained in the Five-Year Plan to ensure that its customers continue to receive state-of-the-art high quality telecommunications and broadband services that the Company has been providing to them for many years as well as to satisfy mandatory reporting requirements and does not share the information for which protection is sought. The Company protects the secrecy of this information with a security protocol that ensures the information is not inadvertently disclosed or disseminated. Only directors, managers and employees with a direct need to know are authorized to access the information.
7. Any previous versions of this information are not publicly available.
8. Because the information is not routinely available, a need exists for maintaining the confidentiality of this information permanently.
9. Not applicable.

Based on the preceding, JSI respectfully requests on behalf of the Company that the Commission grant confidential treatment under Section 0.459 to Company's Five-Year Plan provided at FCC Form 481 Line 112 attachment.

Please contact the undersigned with any questions regarding this request.

Sincerely,



John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

FCC Form 481 - Carrier Annual Reporting Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
---	---------------------------------------	---

<010> Study Area Code	421935
<015> Study Area Name	OREGON FARMERS MUT
<020> Program Year	2016
<030> Contact Name: Person USAC should contact with questions about this data	Wendy Ottman
<035> Contact Telephone Number: Number of the person identified in data line <030>	6604463391 ext.
<039> Contact Email Address: Email of the person identified in data line <030>	ottman@ofmlive.net

JUN 29 2015
Federal Communications Commission
Office of the Secretary

ANNUAL REPORTING FOR ALL CARRIERS	54.313 Completion Required	54.422 Completion Required
--	----------------------------------	----------------------------------

<100>	Service Quality Improvement Reporting	(complete attached worksheet)	✓	
<200>	Outage Reporting (voice)	(complete attached worksheet)	✓	✓
<210>	<input checked="" type="checkbox"/> <-- check box if no outages to report		✓	✓
<300>	Unfulfilled Service Requests (voice)	0	✓	✓
<310>	Detail on Attempts (voice)		✓	✓
<320>	Unfulfilled Service Requests (broadband)	1	✓	✓
<330>	Detail on Attempts (broadband)	421935mo330.pdf	✓	✓
<400>	Number of Complaints per 1,000 customers (voice)		✓	✓
<410>	Fixed	0.0	✓	✓
<420>	Mobile	0.0	✓	✓
<430>	Number of Complaints per 1,000 customers (broadband)		✓	✓
<440>	Fixed	0.0	✓	✓
<450>	Mobile	0.0	✓	✓
<500>	Service Quality Standards & Consumer Protection Rules Compliance	(check to indicate certification)	✓	✓
<510>	421935mo510.pdf	(attached descriptive document)	✓	✓
<600>	Functionality in Emergency Situations	(check to indicate certification)	✓	✓
<610>	421935mo610.pdf	(attached descriptive document)	✓	✓
<700>	Company Price Offerings (voice)	(complete attached worksheet)	✓	✓
<710>	Company Price Offerings (broadband)	(complete attached worksheet)	✓	✓
<800>	Operating Companies and Affiliates	(complete attached worksheet)	✓	✓
<900>	Tribal Land Offerings (Y/N)?	(if yes, complete attached worksheet)	✓	✓
<1000>	Voice Services Rate Comparability Certification	Yes	✓	✓
<1010>		(attach descriptive document)	✓	✓
<1100>	Certify whether terrestrial backhaul options exist (Yes or No)	(if not, check to indicate certification)	✓	✓
<1110>		(complete attached worksheet)	✓	✓
<1200>	Terms and Condition for Lifeline Customers	(complete attached worksheet)	✓	✓

Price Cap Carriers, Proceed to Price Cap Additional Documentation Worksheet

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

<2000>	(check to indicate certification)	✓	
<2005>	(complete attached worksheet)	✓	✓
Rate of Return Carriers, Proceed to ROR Additional Documentation Worksheet			
<3000>	(check to indicate certification)	✓	✓
<3005>	(complete attached worksheet)	✓	✓

**(100) Service Quality Improvement Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421935
<015>	Study Area Name	OREGON FARMERS MUT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net
<110>	Has your company received its ETC certification from the FCC?	(yes / no) <input type="radio"/> <input checked="" type="radio"/>
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) <input type="radio"/> <input type="radio"/>

If your answer to Line <111> is yes, then you are required to file a progress report, on line <112> delineating the status of your company's existing § 54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service.

<112> Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your company is a CETC which only receives frozen support, your progress report is only required to address voice telephony service.

421935mo112.pdf

Name of Attached Document

Please select the appropriate responses below (Yes, No, Not Applicable) to confirm that the attached document(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to §54.202(a). The information shall be submitted at the wire center level or census block as appropriate.

- <113> Maps detailing progress towards meeting plan targets
- <114> Report how much universal service (USF) support was received
- <115> How much (USF) was used to improve service quality and how support was used to improve service quality
- <116> How much (USF) was used to improve service coverage and how support was used to improve service coverage
- <117> How much (USF) was used to improve service capacity and how support was used to improve service capacity
- <118> Provide an explanation of network improvement targets not met in the prior calendar year.

Yes
Yes
Yes
Yes
Yes
Not Applicable

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<701>	Residential Local Service Charge Effective Date	1/1/2015
<702>	Single State-wide Residential Local Service Charge	

~~See attached worksheet~~

<010>	Study Area Code	421935
<015>	Study Area Name	OREGON FARMERS MUT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net
<810>	Reporting Carrier	Oregon Farmers Mutual Telephone Company
<811>	Holding Company	Northwest Missouri Holdings, Inc.
<812>	Operating Company	Oregon Farmers Mutual Telephone Company

Page 6

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code	421935
<015> Study Area Name	OREGON FARMERS MUT
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035> Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached document(s), on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421935
<015>	Study Area Name	OREGON FARMERS MUT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net

<1120> Please confirm whether terrestrial backhaul options exist within the supported area pursuant to § 54.313(g) (Yes, No).

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

<010>	Study Area Code	421935
<015>	Study Area Name	OREGON FARMERS MUT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP http://www.ofmlive.net/lifeline_OFM.html

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒
- <1222> Details on the number of minutes provided as part of the plan, ☒
- <1223> Additional charges for toll calls, and rates for each such plan. ☒

(2000) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	421935
<015>	Study Area Name	OREGON FARMERS MUT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035>	Contact Telephone Number - Number of person identified in data line <030>	8004463391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ottmanw@milive.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental Connect America Phase I support, frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

- <2010> 2nd Year Certification (47 CFR § 54.313(b)(1)i)
- <2011a> 3rd Year Certification (47 CFR § 54.313(b)(1)ii)
- <2011b> Attachment (47 CFR § 54.313(b)(1)iii)

Name of Attached Document(s) Listing Required Information

Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))

- <2012> 2013 Frozen Support Calculation (47 CFR § 54.313(c)(1))
- <2013> 2014 Frozen Support Calculation (47 CFR § 54.313(c)(2))
- <2014> 2015 Frozen Support Calculation (47 CFR § 54.313(c)(3))
- <2015> 2016 and future Frozen Support Calculation (47 CFR § 54.313(c)(4))

Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))

- <2016> Certification Support Used to Build Broadband

Connect America Phase II Reporting (47 CFR § 54.313(e))

- <2017> 3rd year Broadband Service Certification
- <2018> 5th year Broadband Service Certification
- <2019> Interim Progress Certification
- <2020> Please check the box to confirm that the attached document(s), on line 2021, contains the required information pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year.

- <2021> Interim Progress Community Anchor Institutions

Name of Attached Document(s) Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation

FCC Form 481

Date Collection Form

OMB Control No. 3060-0066/OMB Control No. 3060-0019

July 2013

<010> Study Area Code 421935
 <015> Study Area Name OREGON FARMERS MUT
 <020> Program Year 2016
 <030> Contact Name - Person USAC should contact regarding this data Wendy Ottman
 <035> Contact Telephone Number - Number of person identified in data line <030> 6604463391 ext.
 <039> Contact Email Address - Email Address of person identified in data line <030> ottman@ofmlive.net

CHECK the boxes below to note compliance on its five year service quality plan (pursuant to 47 CFR § 54.202(a)) and, for privately held carriers, ensuring compliance with the financial reporting requirements set forth in 47 CFR § 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

- (3010) Progress Report on 5 Year Plan
 Milestone Certification (47 CFR § 54.313(f)(1)(i))

421935mo3010.pdf

Name of Attached Document Listing Required Information

- (3011) Please check this box to confirm that the attached document(s), on line 3012 contains the required information pursuant to § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addresses of community anchor institutions to which began providing access to broadband service in the preceding calendar year. ☒

421935mo3012.pdf

- (3012) Community Anchor Institutions (47 CFR § 54.313(f)(1)(iii))

Name of Attached Document Listing Required Information

- (3013) Is your company a Privately Held ROR Carrier (47 CFR § 54.313(f)(2))
 (3014) If yes, does your company file the RUS annual report

(Yes/No) ☒
 (Yes/No) ☒

Please check these boxes to confirm that the attached document(s), on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:

- (3015) Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)
 (3016) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

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☒

- (3017) If the response is yes on line 3014, attach your company's RUS annual report and all required documentation

Name of Attached Document Listing Required Information

- (3018) If the response is no on line 3014, Is your company audited?

(Yes/No) ☒

If the response is yes on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3019) Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications
 (3020) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows
 (3021) Management letter and audit opinion issued by the independent certified public accountant that performed the company's financial audit

☒
☒
☒

If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains:

- (3022) Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers,
 (3023) Underlying information subjected to a review by an independent certified public accountant
 (3024) Underlying information subjected to an officer certification.
 (3025) Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows

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☐
☐

421935mo3026.pdf

- (3026) Attach the worksheet listing required information

Name of Attached Document Listing Required Information

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(3000) Rate Of Return Carrier Additional Documentation (Continued)

RCC Form 481

Data Collection Form

OMB Control No. 3050-0085/OMB Control No. 3050-0019

July 2013

<010> Study Area Code	421935
<015> Study Area Name	OREGON FARMERS MUT
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035> Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0586/OMB Control No. 3060-0619 July 2013
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<010> Study Area Code	421935
<015> Study Area Name	OREGON FARMERS MUT
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035> Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 483 OMB Control No: 3060-0966/OMB Control No: 3060-0819 July 2013
---	--

<010> Study Area Code	421935
<015> Study Area Name	OREGON FARMERS MUT
<020> Program Year	2016
<030> Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035> Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>Wendy Ottman</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	Wendy Ottman
Name of Reporting Carrier:	OREGON FARMERS MUT
Signature of Authorized Officer:	CERTIFIED ONLINE
Printed name of Authorized Officer:	Wendy Ottman
Title or position of Authorized Officer:	Asst. General Manager
Telephone number of Authorized Officer:	6604463391 ext.
Study Area Code of Reporting Carrier:	421935
Filing Due Date for this form:	07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	OREGON FARMERS MUT
Name of Authorized Agent or Employee of Agent:	JSI
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE
Printed name of Authorized Agent or Employee of Agent:	Cassandra Heyne
Title or position of Authorized Agent or Employee of Agent:	Consultant
Telephone number of Authorized Agent or Employee of Agent:	3014597590 ext.
Study Area Code of Reporting Carrier:	421935
Filing Due Date for this form:	07/01/2015
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

REDACTED FOR PUBLIC INSPECTION

Attachments

REDACTED – FOR PUBLIC INSPECTION

ATTACHMENT - LINE 112

**Five-Year Network Improvement Plan and
Progress Report**

ATTACHMENT REDACTED IN ENTIRETY

	DESCRIPTION OF SERVICE REQUESTED	SERVICE REQUESTED (✓ ALL APPLICABLE TO UNFULFILLED REQUEST)		DESCRIBE HOW CARRIER ATTEMPTED TO PROVIDE SERVICE
		BROADBAND	VOICE	
Customer 1 - SAC 421835	Broadband	X		Customer has voice service and requested broadband but is too far from CO.

Oregon Farmers Mutual Telephone Company-
FCC Form 481 – Line 510
Program Year – 2016

Service Quality Standards and Consumer Protection Compliance Explanation Document:

Oregon Farmers Mutual Telephone Company is in compliance with all Federal and State service quality standards and consumer protection rules.

The Missouri Public Service Commission has defined standards for service quality in its Code of State Regulations 4 CSR 240.32.070 for incumbent local exchange carriers. Oregon Farmers Mutual Telephone Company is in compliance with these rules. The company has systems in place for customers with regard to service trouble reporting, billing issue questions and complaints, service offerings information, after hours service problem reporting and other customer issues resolution.

Oregon Farmers Mutual Telephone Company maintains the results of these quality standards items at place of business.

Oregon Farmers Mutual Telephone Company also complies with all applicable consumer protection rules including the implementation of customer data protection under the Federal Communications Commission's rules for Customer Proprietary Network Information.

Oregon Farmers Mutual Telephone Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order* when it becomes effective.

Oregon Farmers Mutual Telephone Company
FCC Form 481 – Line 610
Program Year – 2016

Emergency Functionality Explanation Document:

The company maintains emergency backup power for the local distribution plant and central office and transmission facilities that keep the company's voice and broadband network functional in an emergency which deprives the company equipment of commercial electrical power.

The central office facility is powered with commercial electric power and battery banks that continue power to the office and transmission equipment for a period of 8 hours in the event of a power source outage. The central office is equipped with a propane powered generator with a fuel capacity of 1 week of generation capacity to continue supplying power in the event of a power outage. The company can remain operational in the situation.

The company's customer distribution network transmission equipment, field cabinets & customer pedestal electronics have power backup that will provide 8 hours of service in the event of a commercial power outage.

The company has additional route capacity to keep emergency service (911 service) available in the event of an emergency situation.

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(700) Price Offerings Including Voice Rate Data
Data Collection Form

FCC Form 481
OMB Control No. 3080-0986/OMB Control No. 3080-0819
July 2013

<010>	Study Area Code	421935
-------	-----------------	--------

<015>	Study Area Name	OREGON FARMERS MUT
-------	-----------------	--------------------

<020>	Program Year	2016
-------	--------------	------

<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
-------	---	--------------

<035> Contact Telephone Number - Number of person identified in data line <030> 6604463391 ext.

<039> Contact Email Address - Email Address of person identified in data line <030> ottman@ofmlive.net

<701> Residential Local Service Charge Effective Date	1/1/2015
---	----------

<702> Single State-wide Residential Local Service Charge

<703>

[illegible]

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(710) Broadband Price Offerings
Data Collection Form

FCC Form 481
OMB Control No. 3060-0985/OMB Control No. 3050-0819
July 2013

<010>	Study Area Code	421935
<015>	Study Area Name	OREGON FARMERS MUT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net

[illegible]

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(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	421935
<015>	Study Area Name	OREGON FARMERS MUT
<020>	Program Year	2016
<030>	Contact Name - Person USAC should contact regarding this data	Wendy Ottman
<035>	Contact Telephone Number - Number of person identified in data line <030>	6604463391 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	ottman@ofmlive.net
<810>	Reporting Carrier	Oregon Farmers Mutual Telephone Company
<811>	Holding Company	Northwest Missouri Holdings, Inc.
<812>	Operating Company	Oregon Farmers Mutual Telephone Company

[illegible]

Oregon Farmers Mutual Telephone Company (SAC 421935)

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Oregon Farmers Mutual Telephone Company hereby certifies that throughout 2014, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 4 Mbps downstream/1 Mbps upstream, and currently, it is taking reasonable steps to provide upon reasonable request actual speeds of at least 10 Mbps downstream/1 Mbps upstream broadband service with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas as determined in an annual survey, and that requests for such service are met within a reasonable amount of time.

Oregon Farmers Mutual Telephone Company (SAC 421935)

**Response to Line 3012 - List of Community Anchor Institutions to Which the ETC Newly
Began Providing Service**

The FCC's *USF/ICC Transformation Order* requires a listing of community anchor institutions to which the ETC newly began providing broadband service. Oregon Farmers Mutual Telephone Company did not newly begin providing community anchor institutions with access to broadband service in calendar year 2014.



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Your business
is our business.

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 26, 2015

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Attention: Wireline Competition Bureau

**Re: Petition for Limited Waiver of § 54.313(f)(2)(ii)
Oregon Farmers Mutual Telephone Company
ETC Annual Reports and Certifications, WC Docket No. 14-58**

Dear Ms. Dortch:

On behalf of Oregon Farmers Mutual Telephone Company ("OFM") JSI respectfully submits the above-referenced Petition for Limited Waiver. OFM seeks a limited waiver of Federal Communications Commission rules Section 54.313(f)(2)(ii) which requires privately held rate-of-return carriers that are not recipients of loans from the Rural Utilities Service to file a copy of their audited financial statement with their ETC Annual Report.

Please direct inquiries regarding this Petition for Limited Waiver to the undersigned consultant for the OFM.

Sincerely,

John Kuykendall
Vice President

Enclosure

Echelon Building II, Suite 200
9430 Research Blvd., Austin, TX 78759
phone: 512-338-0473, fax: 512-346-0822

Eagandale Corporate Center, Suite 310
1380 Corporate Center Curve, Eagan, MN 55121
phone: 651-452-2660, fax: 651-452-1909

6849 Peachtree Dunwoody Road
Bldg. B-3, Suite 200, Atlanta, GA 30328
phone: 770-569-2105, fax: 770-410-1608

547 South Oakview Lane
Bountiful, UT 84010
phone: 801-294-4576, fax: 801-294-5124

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
ETC Annual Reports and)	WC Docket No. 14-58
Certifications)	

**PETITION OF OREGON FARMERS MUTUAL TELEPHONE COMPANY FOR
LIMITED WAIVER OF SECTION 54.313(f)(2)(ii)**

Oregon Farmers Mutual Telephone Company ("OFM" or the "Company") pursuant to Section 1.3 of the Federal Communications Commission's ("FCC" or "Commission") Rules¹ requests a limited waiver of the requirement specified in Section 54.313(f)(2)(ii).² This rule requires privately held rate-of-return carriers that are not recipients of loans from the Rural Utilities Service ("RUS") whose financial statements are audited in the ordinary course of business to file a copy of their audited financial statement with their ETC Annual Report (otherwise known as the "Form 481").³

As demonstrated herein, "good cause" exists to allow OFM a limited waiver to submit its audited financial statement after the July 1, 2015 deadline to submit its Form 481. Due to delays caused by court proceedings, the Company's audited financial statement will not be available by the July 1 deadline. However, the Company will be submitting a draft version of its financial statement in its Form 481 and will populate the Lines 3027 – 3034 with the required financial

¹ 47 C.F.R. §1.3

² 47 C.F.R. § 54.313 (f)(2)(ii).

³ *Id.* Alternatively, the carrier may file "a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers, accompanied by a copy of a management letter issued by the independent certified public accountant that performed the company's financial audit." *Id.*

data. Accordingly, the public interest would be served by allowing the Company additional time to supplement its Form 481 with the finalized version of the audited financial statement.

I. Grant of this Waiver is Warranted

OFM is a privately held rate-of-return carrier that is not a recipient of loans from RUS and, in the past, has had financial statements that were audited in the ordinary course of business. Generally, the Commission's rules may be waived for good cause shown.⁴ Furthermore, the Commission may exercise its discretion to waive a rule where the particular facts make strict compliance inconsistent with the public interest.⁵ As demonstrated herein, grant of this petition is warranted.

Beginning earlier this year and continuing to the present day, OFM has been engaged in a legal dispute which has prevented the Company from being able to finalize its audited financial statements by the July 1 deadline.⁶ Although the finalized version of the audited financial statements will not be completed until after July 1, the Company has a draft version of the report which it will submit in its FCC Form 481 filing. Further, because the financial data in the draft version has been finalized, the Company will populate that data in Lines 3027 – 3034 of its Form 481. Accordingly, waiver of Section 54.313(f)(2)(ii) is sought only to be able to supplement the Form 481 after the filing deadline so that the finalized version of the audited financial statement can replace the draft version.⁷ Such a limited waiver would further the public interest as strict compliance with this rule could result in the Company having its high cost universal service

⁴ 47 C.F.R. § 1.3.

⁵ *Northeast Cellular Telephone co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) (Northeast Cellular).

⁶ *See, e.g., In re Northwest Missouri Holdings, Inc. et. al v. Townes Missouri, Inc.*, Bankr. Case No.15-10728-BLS Jointly Administered, Civ. No. 15-470-LPS (D. Del. June 11, 2015).

⁷ At this point in time, the Company does not know when the audited financial statements will be ready for submission. Accordingly, the Company hereby commits to providing the Commission with an update no later than August 31, 2015 if it has not received the audited financial statements by that date.

support reduced on a pro-rata daily basis equivalent to the period of non-compliance,⁸ an extremely harsh penalty for this rural rate-of-return carrier.

Respectfully submitted,

Oregon Farmers Mutual Telephone Company

By: /s/ Wendy Ottman
Wendy Ottman
Asst. General Manager
Oregon Farmers Mutual Telephone Company
18 E Nodaway St.
Oregon, MO 64473

June 26, 2015

⁸ See 47 C.F.R. § 54.313(j).

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ATTACHMENT - LINE 3026

ATTACHMENT REDACTED IN ENTIRETY